



# ADVISORY BULLETIN

June 22, 2020  
Supersedes December 10, 2018

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## **MMFLA Restrictions for Patients and Caregivers**

Pursuant to the Medical Marijuana Facilities Licensing Act (MMFLA), there are restrictions for employees, licensees, and investors related to their registration with the Michigan Medical Marijuana Program (MMMP).

### **Rule 2(2)(i) in the Marijuana Employees Rule Set - R 420.602(2)(i)**

When a registered primary caregiver is hired as an employee of a grower, processor, or secure transporter licensed under the MMFLA, the individual shall withdraw registration as a registered primary caregiver.

### **Rule 10(2) in the Marijuana Licensees Rule Set - R 420.110(2)**

To be eligible for a secure transporter license under the MMFLA, the applicant and each investor with an interest in the secure transporter must not be a registered qualifying patient or registered primary caregiver. These restrictions do not apply to employees, licensees, or investors of safety compliance facilities or provisioning centers under the MMFLA.

Marijuana Regulatory Agency (MRA) inspectors will ask for proof of card status withdrawal during an inspection of a licensed grower, processor, or secure transporter.

### **Section 501 (8)(a) in the MMFLA 333.27501**

Until December 31, 2021, licensed growers and processors must have a minimum of 2 years' experience as a registered primary caregiver or employ someone who does.

Until December 31, 2021, MRA inspectors will verify the designated person's caregiver experience during an inspection of a licensed grower or processor.

Any non-compliance with these requirements may result in failed inspections or sanctions, including, but not limited to, license denial, limitation, fines, revocation, suspension, nonrenewal, administrative holds, and orders to cease operations.

Questions can be sent to the MRA via email at  
[MRA-Enforcement@michigan.gov](mailto:MRA-Enforcement@michigan.gov).

For more information about the MRA, please visit [www.michigan.gov/MRA](http://www.michigan.gov/MRA).